

1 Hal Taylor, Esq.
2 Of Counsel, Olinsky Law Group
3 NV Bar No.: 4399
4 2551 West Lakeridge Shores
5 Reno, NV 89519
6 Tel: (775) 825-2223
7 Fax: (775) 329-1113
8 Email: HalTaylorLawyer@gbis.com
9 Attorney for Plaintiff

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

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SHAUNTELLE MARIE LEE,)
)
Plaintiff,) CASE NO.
) 2:23-cv-00326-BNW
v.)
) SECOND UNOPPOSED MOTION
) FOR EXTENSION OF TIME TO FILE
KILOLO KIJAKAZI, ACTING) PLAINTIFF'S BRIEF
COMMISSIONER OF SOCIAL SECURITY,)
)
Defendant.)
)

16 Plaintiff by her attorney, moves for a twenty-eight (28) day extension of time to file
17 Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed July 31, 2023. This
18 is Plaintiff's second request for an extension of time in this matter. On May 25, 2023, this Court
19 granted Plaintiff's first Motion for an Extension of Time (Dkt. No. 11).
20

21 Counsel requests this extension due to two briefing attorneys within the last two months
22 going out on unexpected, prolonged, medical leaves. These leaves necessitated a complete
23 reorganization of the attorney's schedules. Further, Counsel has explored the possibility of
24 reassignment of this matter to a different attorney, but is unable to do so due to multiple,
25 simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly
26 prepare Plaintiff's brief. For instance, between July 28, and August 25, 2023, staff in Counsel's
27 office have one hundred and six (106) Plaintiff briefs due. This figure does not include Oral
28

1 Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various
2 other tasks which arise throughout the course of litigation. These circumstances do not allow for
3 Plaintiff's Counsel to properly prepare the brief by the current deadline. This request will not
4 cause Defendant any undue hardship. This extension is needed to thoroughly and properly
5 prepare the brief by the current deadline.

7 Wherefore, Plaintiff requests an extension from July 31, 2023, up to and including
8 August 28, 2023 to file their brief. Counsel for the Plaintiff has conferred with Defendant's
9 Counsel who has no objection to this request.

10 Dated July 26, 2023.

12 Respectfully submitted,

13 */s/Hal Taylor*
14 Hal Taylor, Esq.

15 **Plaintiff's Certificate of Service:**

17 I certify that I caused the Unopposed Motion for Extension of Time to be served today,
18 July 26, 2023, by CMECF to Blaine T Welsh, and Oscar Gonzalez De Llano, who are filing
19 users of the CM/ECF system.

21 */s/Hal Taylor*
22 Hal Taylor

23 **ORDER**

24 **IT IS SO ORDERED**

25 **DATED:** 11:06 am, July 27, 2023

26 
27

28 **BRENDA WEKSLER**
UNITED STATES MAGISTRATE JUDGE